

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**MOTION FOR CONTINUANCE OF TRIAL  
AND PRETRIAL DEADLINES**

Defendant, **Tammy Walden Thomas**, by her counsel, Gabriela Vega, moves this Court for an order continuing the trial and related dates set and for a finding of excludable time under the Speedy Trial Act as found in Title 18, United States Code, §§ 3161, *et seq.* In support therefore, counsel states:

1. Trial is scheduled for July 19, 2021.
2. Counsel requires additional time to review the facts and law with Ms. Thomas so she can decide how she would like to proceed.
3. Ms. Thomas seeks a continuance of at least ninety days. This request is not made for delay, but so justice may be served.
4. The government opposes a 90-day continuance but does not oppose a 30-day continuance.

For the reasons stated above, Ms. Thomas requests that her trial be continued for a period of at least ninety (90) days, or as the Court might otherwise direct, and that the related pretrial deadlines in the Court's prior scheduling order be similarly continued.

Respectfully submitted,

s/ Gabriela Vega  
Gabriela Vega  
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Northern District of Texas  
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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Assistant United States Attorney Fabio Leonardi, and confirmed that the government opposes the 90-day request but does not oppose a 30-day continuance. Counsel understands that AUSA Leonardi intends to file a statement further explaining his position.

s/ Gabriela Vega  
Gabriela Vega